

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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IN RE: Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to

*All Cases*

**AFFIDAVIT OF BRIDGET  
AHMANN IN SUPPORT OF  
APPLICATION FOR FEES AND  
COSTS PURSUANT TO  
NOVEMBER 23, 2016 ORDER**

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I, Bridget M. Ahmann, declare as follows:

1. I am an attorney at Faegre Baker Daniels LLP, and one of the attorneys representing 3M Company (“3M”) and Arizant Healthcare Inc. (“Arizant”) (collectively “Defendants”) in this litigation. I submit this affidavit in support of Defendants’ Application for Fees and Costs, pursuant to the Court’s Order of November 23, 2016. [Doc. 148] Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

2. Faegre Baker Daniels has an alternative fee arrangement with 3M Company, with a fixed fee for its work in defense of this litigation. Accordingly, Faegre Baker Daniels does not submit invoices to 3M based upon hourly fees. For purposes of calculating the fees incurred by Faegre Baker Daniels in connection with Defendants’ Motion to Compel Third-Party Augustine Entities to Produce Documents in Response to Subpoenas (“the Motion”), we have reviewed the itemization of time for this matter as recorded by the various attorneys and paralegal involved in the Motion. The time

incurred, together with the reasonable hourly rates of the professionals involved, is reflected below. The tasks involved by each timekeeper are attached as Exhibit A.

3. The attorneys and paralegal associated with this matter recorded a total of \$20,838.64 in fees as part of bringing this Motion. Attached hereto as Exhibit A is a record of the time entries for these professionals. Legal administrative assistants and other support staff have also devoted time to this motion. Their efforts are not separately recorded and are captured as overhead, which is a factor in the hourly billing rates described below.

4. I worked 7.3 hours in preparing the Motion and attending the hearing on the Motion, which resulted in fees of \$3,878.15. My billing rate for this type of litigation is \$531.25 per hour.

5. Bruce Jones, a Faegre Bakers Daniel partner representing Defendants, worked 20.1 hours in preparing the Motion, which resulted in fees of \$11,446.95. Mr. Jones's billing rate for this type of litigation is \$569.50 per hour.

6. Jeff Wojciechowski, another attorney representing Defendants, worked 13.2 hours in preparing the Motion, which resulted in fees of \$3,686.04. Mr. Wojciechowski's billing rate for this type of litigation is \$250.75 per hour.

7. Michele Knoer, a paralegal, worked 8.6 hours in preparing the Motion, which resulted in fees of \$1,827.50. Ms. Knoer's billing rate for this type of litigation is \$212.50 per hour.

8. I have reviewed the timekeeping entries and I believe that the fees recorded in connection with bringing the Motion are reasonable in light of the circumstances. The work performed was necessary to Defendants' effective representation before the Court.

9. Defendants also incurred a total of \$322.90 in costs in bringing the Motion. Attached hereto as Exhibit B is a true and correct record of these costs.

10. In total, therefore, Defendants request that the Court award them a total of \$20,838.64 for the attorneys' fees and \$322.90 in costs incurred by Faegre Baker Daniels that were incurred as a result of bringing the Motion.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

December 5, 2016

*s/Bridget M. Ahmann*

Bridget M. Ahmann